

EXHIBIT A

In the Matter Of:

LYNNE FREEMAN vs

TRACY DEEBS-ELKENANEY

LYNNE FREEMAN

March 24, 2023



1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 Civil Action No. 1:22-cv-02435-LLS-SN

4 LYNNE FREEMAN, an individual,
5 Plaintiff,

6 -vs-

7 TRACY DEEBS-ELKENANEY P/K/A
8 TRACY WOLFF, an individual,
9 EMILY SYLVAN KIM, an
10 individual, PROSPECT AGENCY,
11 LLC, a New Jersey limited
12 liability company, ENTANGLED
13 PUBLISHING, LLC, a Delaware
14 limited liability company,
15 HOLTZBRINCK PUBLISHERS, LLC
16 D/B/A MACMILLAN, a New York
17 limited liability company, and
18 UNIVERSAL CITY STUDIOS, LLC, a
19 Delaware limited liability
20 company,

21 Defendants.

22 _____/
23
24 DEPOSITION OF
25 Lynne Freeman
CONFIDENTIAL - ATTORNEYS' EYES ONLY

Friday, March 24, 2023
9:04 a.m. - 6:19 p.m.
Pacific Time

Remote Location
Via Zoom Videoconference
All Parties Remote

STENOGRAPHICALLY REPORTED BY:
ERICA FIELD, RPR
JOB NO. 886198

1 APPEARANCES:

2
3
4 On behalf of the Plaintiff:
5 DONIGER BURROUGHS
6 603 Rose Avenue
7 Venice, California 90291
8 (310) 590-1820
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11 On behalf of the Plaintiff:
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17 BY: MARK PASSIN, ESQUIRE
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19 On behalf of Prospect Agency and Emily
20 Sylvan Kim:
21 KLARIS LAW
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1 APPEARANCES CONTINUED:

2
3
4 On behalf of Tracy Deebs-Elkenaney p/k/a
5 Tracy Wolff, Entangled Publishing, LLC,
6 Holtzbrinck Publishers, LLC d/b/a Macmillan,
7 and Universal City Studios LLC:

8 COWAN, DEBAETS, ABRAHAMS & SHEPPARD

9 41 Madison Avenue

10 38th Floor

11 New York, New York 10010

12 (212) 974-7474

13 BY: NANCY WOLFF, ESQUIRE

14 CECE COLE, ESQUIRE

15 BENJAMIN HALPERIN, ESQUIRE

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18 bhalperin@cdas.com

19 ALSO PRESENT:

20 Tracy Wolff

21 Elizabeth Pelletier

22 VIDEOGRAPHER:

23 Adriel Olvera

24 Isaac Orihuela

1 Q. You mentioned that Mark Passin is
2 your attorney of record here as well?

3 A. Correct.

4 Q. How do you pay Mark Passin?

5 THE WITNESS: I assume I'm able
6 to answer these questions, Stephen?

7 MR. DONIGER: You can say the
8 nature of the --

9 THE WITNESS: Okay.

10 A. So Mark is on contingency.

11 BY MS. COLE:

12 Q. And what about Paul LiCalsi's
13 firm? How is he being paid?

14 A. Paul LiCalsi's firm is being paid
15 hourly.

16 Q. And you recently retained Doniger
17 Burroughs as counsel of record; isn't that
18 true?

19 A. Correct.

20 Q. How is Doniger Burroughs being
21 compensated here?

22 A. They're contingency counsel.

23 MS. COLE: I have no further
24 questions on my end.

25 If we want to take a break, or

CERTIFICATE OF REPORTER

UNITED STATES DISTRICT COURT)
SOUTHERN DISTRICT OF NEW YORK)

I, ERICA FIELD, RPR, Stenographic Court
Reporter, certify that I was authorized to
and did stenographically report the
deposition of LYNNE FREEMAN, pages 1 through
355; that a review of the transcript was not
requested; and that the transcript is a true
and complete record of my stenographic notes.

I further certify that I am not a
relative, employee, attorney, or counsel of
any of the parties, nor am I a relative or
employee of any of the parties' attorney or
counsel connected with the action, nor am I
financially interested in the action.

DATED this 27th day of March, 2023.



Erica Field, RPR